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The American Automobile Association, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE AMERICAN AUTOMOBILE
ASSOCIATION, INC.,

Plaintiff,

v.

AAA TOURISM, AAA CONVENTION
CENTER CONDOS LLC, A & A TOURISM,
INC., MOHAMMAD ALAM, and MARICELA
ALAM,

Defendants.

Civil Case No.: 2:18-cv-01644-APG-GWF

CONSENT ORDER OF JUDGMENT

WHEREAS, Plaintiff The American Automobile Association, Inc. ("AAA") has brought an action in this Court against Defendants AAA Tourism, AAA Convention Center Condos LLC, A & A Tourism, Inc., Mohammad Alam, and Maricela Alam (collectively, the "Parties"), alleging violations of the Federal Trademark Act ("Lanham Act"), 15 U.S.C. §§ 1114, 1125, and Nevada state law;

WHEREAS, this Court has jurisdiction over this civil action under 15 U.S.C. §§ 1121 and 1125, and under 28 U.S.C. §§ 1331, 1332, 1337, and 1338;

WHEREAS, AAA and Defendants have entered into a Settlement Agreement to resolve any and all controversies and disputes between them existing as of this date;

WHEREAS, AAA agrees to dismiss without prejudice its claims against Defendants;

WHEREAS, AAA agrees to allow Defendants until December 31, 2018 to cease all use of AAA's trademarks, and subject to Defendants' continued adherence to the Settlement Agreement, not to pursue claims for damages arising out of such use occurring prior to such date;

WHEREAS, Defendants admit any future unauthorized use of AAA's trademarks would violate the Lanham Act and Nevada state law;

WHEREAS, Defendants waive all defenses and counterclaims which it might otherwise raise at a trial on the merits of AAA's demand for a permanent injunction and/or damages;

NOW THEREFORE, Defendants consent and agree that this Court enter a judgment permanently enjoining it from any future unauthorized use of AAA's trademarks, or of marks confusingly similar to any of them.

The Court does, hereby, upon consent of the Parties, declare that a permanent injunction issue herein as follows:

IT IS ORDERED, ADJUDGED, AND DECREED:

1. That Defendants, their agents, attorneys, representatives, employees, and all persons in active concert or participation with them who receive notice hereof, are hereby permanently enjoined beginning from December 31, 2018 from any unauthorized use of AAA's trademarks, or of marks confusingly similar to any of them;

2. That each and every claim for damages, penalties, costs, and attorneys' fees by AAA against Defendants, other than the permanent injunction granted herein, is hereby dismissed without prejudice pursuant to the representations made by Defendants in the Settlement Agreement, and subject to fulfillment of all obligations set forth in the Settlement Agreement, except for such damages, penalties, costs, and/or attorneys' fees which might result from any violation of this Consent Order of Judgment; and

3. That this case shall be closed, except that this Court shall retain jurisdiction for the purpose of enforcing the Settlement Agreement and this Consent Order of Judgment.

SO ORDERED.

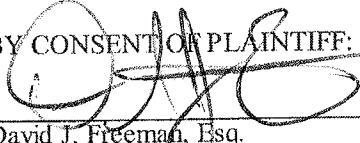
Dated: February 7, 2019.

Las Vegas, NV



THE HONORABLE ANDREW P.
GORDON
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

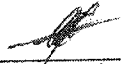
BY CONSENT OF PLAINTIFF:



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BY CONSENT OF DEFENDANTS:



Mohammad Alam
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*On behalf of Defendants AAA Tourism, AAA
Convention Center Condos LLC, A & A
Tourism, Inc., and Mohammad Alam*

For,


Maricela Alam
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*On behalf of Defendants AAA Tourism, AAA
Convention Center Condos LLC, A & A
Tourism, Inc., and Maricela Alam*